

IN THE UNITED STATES COURT OF FEDERAL CLAIMS  
(Bid Protest)

CLASSIC AIR CHARTER, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
THE UNITED STATES,	)	No. 25-286C
	)	Judge Hertling
Defendant,	)	
	)	
and	)	
	)	
CSI AVIATION, INC.	)	
	)	
Defendant-Intervenor.	)	
	)	

DEFENDANT’S STATUS REPORT

On April 25, 2025, the Court vacated all pending deadlines and ordered all proceedings to remain stayed pending a further motion or voluntary dismissal from the parties. ECF No. 43. Defendant, the United States, had previously indicated in our April 22, 2025 status report, ECF No. 42, that the United States would file a motion to dismiss by May 7, 2025, if the protest had not been voluntarily dismissed by then. Since then, plaintiff, Classic Air Charter, Inc. (CAC), has advised the United States that it would prefer not to file a voluntary dismissal until the United States provides further information about how Immigration and Customs Enforcement (ICE) intends to proceed after the cancellation of the solicitation. ICE is currently evaluating its options but has not yet made a final decision about its next steps and timeline.

In an effort to obtain mutual agreement among the parties, the United States respectfully proposes to wait an additional seven days, through and including May 14, 2025, before filing an opposed motion to dismiss. If ICE makes a final decision about its next steps within that

timeline, such that CAC is willing to agree to a voluntary dismissal, the parties and the Court would not need to expend further resources addressing an opposed motion to dismiss in this protest regarding a now-cancelled solicitation. However, the United States appreciates that this case should not remain on the Court's docket indefinitely. If CAC is not willing to voluntarily dismiss by May 14<sup>th</sup>, the United States will file an opposed motion to dismiss on that date without further delay.

Respectfully submitted,

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Dated: May 7, 2025